SOCIETY FOR ANIMAL PROTECTIVE LEGISLATION

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FCC MAIL BRANCH

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Office of the Secretary Federal Communications Commission Washington, D.C. 20554

Dear Sir or Madam:

I am submitting the following comments on behalf of the Society for Animal Protective Legislation, in response to the FCC NPRM-PR Docket No. 93-133, which proposes to amend the Communications Act relating the radio officer requirement.

We wish to register our opposition to the FCC's latest proposed rulemaking that would grant U.S. flag ships an automatic exemption to sail on certain international and nearly all domestic voyages without a radio officer, as long as they stay within 150 nautical miles of land.

We believe that the present exemption policy poses an unacceptably high risk of danger to our oceans and shorelines. To broaden the criteria upon which exemptions are granted is to raise the environmental stakes even further. The damage from just one oil tanker running aground far overshadows the meager economic savings that shipowners would enjoy collectively from expanding the proposed radio officer exemption.

We fear that classifying voyages through the waters of neighboring foreign countries as "domestic" because they will not actually dock in a foreign port, opens the door to short-sighted cost-cutting measures by shippwners. If oil tankers are allowed to sail from Alaska, through the Panama Canal to the east coast

Regretfully, we have already witnessed many times the disaster an oil spill can wreak on a shoreline ecosystem. One need only think of the Exxon Valdez to see how expensive clean-up is, how long it takes, and how tragic its consequences on local land and marine life can be. We believe that the expense of maintaining on-board radio electronics officers is extremely modest when compared to what just one mishap can waste in monetary terms.

Therefore, the Society for Animal Protective Legislation urges the FCC not to follow through with its proposal to expand the radio officer exemption. The potential costs to animal life and the environment are just too great.

Sincerely,

Christine Stevens

Christine Sterens

Secretary